

**DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

UNITED STATES OF AMERICA and THE UNITED STATES VIRGIN ISLANDS,	)	
	)	
	)	
Plaintiffs,	)	Case No. 1:11-cv-00006-RAM/EAH
	)	
v.	)	
	)	
HOVENSA LLC; LIMETREE BAY	)	
REFINING, LLC; AND LIMETREE BAY	)	
TERMINALS, LLC,	)	
	)	
Defendants.		

**MOTION FOR *PRO HAC VICE* ADMISSION OF JONATHAN D. BRIGHTBILL  
PURSUANT TO LOCAL RULES 83.1(B)(2) AND 83.1(C)(1)**

Pursuant to Rules 83.1(b)(2) and 83.1(c)(1) of the Rules of this Court, Plaintiff United States Virgin Islands, through its undersigned attorney (“Sponsor”), who is a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission *pro hac vice* of:

Applicant’s Name:	Jonathan D. Brightbill (the “Applicant”)
Firm Name:	Winston & Strawn LLP
Address:	1901 L Street NW
City/State/Zip:	Washington, DC 20036
Phone Number:	202-282-5000
Fax Number:	202-282-5100
Email:	JBrightbill@winston.com

In his Declaration (appended hereto), Applicant certifies that:

1. He is a member in good standing of the bar of the District of Columbia; attached hereto is a copy of a certificate of good standing from the respective jurisdiction. A hard copy of the certificate will be delivered to the clerk’s office of the District Court;
2. He has not suffered any disbarment or suspension of his license to practice before any jurisdiction,

3. He has not been admitted to this Court *pro hac vice* in the past twelve (12) months,

4. He has not been admitted to this Court *pro hac vice* in more than three (3) cases in any calendar year, and

5. He is not presently admitted to this Court *pro hac vice* in three (3) active cases.

Further, the undersigned Sponsor is familiar with the Applicant's experience and qualifications, and otherwise has reason to know the Applicant is qualified for admission.

The undersigned Sponsor further represents that the United States Virgin Islands has requested and authorized the Applicant to represent the United States Virgin Islands in this proceeding.

The Applicant's Declaration and Application for *Pro Hac Vice* Admission are appended hereto. The Applicant has represented to the Sponsor that he has submitted to the Clerk's Office a check in payment of the admission fee in accordance with the current admission fee schedule approved by the Court.

Dated: September 21, 2023

Respectfully Submitted,

Government of the Virgin Islands  
Ariel M. Smith, Esq.  
Attorney General

/s/ Pamela R. Tepper, Esq.  
Pamela R. Tepper, Esq.  
Solicitor General  
Virgin Islands Department of Justice  
3438 Kronprindsens Gade  
GERS Building, 2<sup>nd</sup> Floor  
St. Thomas, VI 08002  
340.774-5666  
340.774-0710 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 21st day of September, 2023, the preceding document was filed electronically with the Clerk of Court using the CM/ECF system, which will send notifications of this filing to all who have made appearances.

/s/ Pamela R. Tepp  
Pamela R. Tepp, Esq.  
Solicitor General